

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:	:	
Arthur J. Drexler	:	Case No. 23-20267-GLT
	:	Chapter 13
Debtor(s)	:	
	:	
Allied First Bank, SB d/b/a	:	
Servbank	:	
Movant(s)	:	Related to Document #42
	:	
vs.	:	Hearing: 6/28/23 at 10:00 a.m.
Arthur J. Drexler, Arthur Drexler, and	:	
Ronda J. Winnecour, Trustee	:	
Respondent(s)	:	

TRUSTEE'S RESPONSE TO MOTION FOR RELIEF
FROM THE AUTOMATIC STAY AND CO-DEBTOR STAY

Ronda J. Winnecour, Chapter 13 Standing Trustee, respectfully represents the following:

1. Allied First Bank, SB D/B/A Servbank requests relief from stay with regard to property located at 449 Morris Street, Pittsburgh, PA 15218.
2. Debtor's Schedules reflect that the fair market value of the property is \$139,000 and Debtor has not claimed any exemption.
3. It is undisputed that Movant is the sole lienholder against the property, however Debtor's Schedules indicate that Movant is the sole lienholder against the property with a claim in the amount of \$157,000 and Movant asserts that the outstanding balance is \$165,360.92.
4. A meeting of creditors was held on April 17, 2023, at which time Debtor was instructed to file an amended plan.
5. Debtor filed an amended plan (Docket No. 46) on May 24, 2023, and a conciliation conference is scheduled for June 15, 2023.
6. Debtor's amended plan proposes to sell the property to pay off the

obligation to Movant.

7. Although Debtor does not yet have a confirmed plan, Debtor nevertheless remitted a payment to the Trustee on May 11, 2023, in the amount of \$1,900.

8. Without a confirmed interim plan or final plan, Trustee cannot disburse payment to Movant and thus this motion for relief from the automatic stay is premature.

WHEREFORE, the Trustee so reports to the Court.

RONDA J. WINNECOUR,
CHAPTER 13 TRUSTEE

Date: June 2, 2023

By: /s/ James C. Warmbrodt
James C. Warmbrodt, PA I.D. 42524
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CERTIFICATE OF SERVICE

I hereby certify that on the 2nd of June 2023, I served one true and correct copy of the foregoing document on the following parties in interest by United States first-class mail, postage prepaid, addressed as follows:

Marta E. Villacorta, Esquire
Office of the United States Trustee
Liberty Center, Suite 970
1001 Liberty Avenue
Pittsburgh, PA 15222-3721

Arthur J. Drexler
449 Morris Street
Pittsburgh, PA 15218

Michael S. Geisler, Esquire
1100 Penn Center Blvd., #704
Pittsburgh, PA 15235

Keri P. Ebeck, Esquire
601 Grant Street, 9th Floor
Pittsburgh, PA 15219

/s/Rosa Richard
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